

ATTACHMENT 1

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PETER OPPENHEIM
CLERK US DISTRICT COURT
WISCONSIN

COMPLAINT FORM

(for non-prisoner filers without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE Western DISTRICT OF District Wisconsin

(Full name of plaintiff(s))

Charmaine R. Farville

vs

Case Number:

21-cv-2-wmc

(Full name of defendant(s))

Kwik Trip Inc

(to be supplied by clerk of court)

Travis Hutzenthaler-owner

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

6345 pheasant lane Middleton WI 53562
(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant

Kwik Trip Inc - Travis Hutzenthaler
(Name)

is (if a person or private corporation) a citizen of Wisconsin

(State, if known)

and (if a person) resides at 1626 Oak St, La Crosse, WI, 54603 - Kwik Trip
(Address, if known) headquarters

and (if the defendant harmed you while doing the defendant's job)

worked for _____
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On February 12, 2020, about 10pm, my manager Robert Oldenburg made a racial joke about my race and hot dogs I just started on night shift on my own and I asked Robert did I need to change the hot dogs on a rollers grill and he asked me "why did I ask" I told him "because they look very dark I thought they may be old". He laughed and replied those are →

② my "black people" hot dogs." I froze and was silent and then Robert said, "Oh I have been around black men all my life so I can say that." I then took a ten minute break to get calm. I feel like Robert racial-discriminated against me and it violated my civil rights as a black African American. On May 21, 2020 I don't know or understand why Robert felt he could joke like that and even if we knew each other I would not let him joke in that manner. This all occur in the kitchen of Kwik Trip Inc - 7508 ~~Century Ave~~ Middleton WI 53562. There are camera and audio in the entire kitchen. On May 21, 2020 at 5:45am in the doorway area of the kitchen entry. Michelle Natrop came into Kwik Trip 7508 Century Ave Middleton WI and for the first time anyone meeting her in this store and she came over and called two of them co-workers who →

③
are both white American. Travis Flannery who was not a lead at this time and Paula Quero was a lead and still is a lead. Those two were pulled into the office by Michelle Natrop and she introduced herself and told them about updates and changes. I found this odd by texting Travis Flannery a hour after shift was over to confirm if everything was ok because I didn't understand why I was not pulled into the office for a meet and greet of the new general manager of the store and I was there before Travis Flannery started. Michelle never speaks to me until after I addressed her about how disrespected she is to me and how she ignores me. On August 11, 2020 at 5:15am Eric the kitchen manager where I work at in Kwiktrip inc on 7508 century ave,

(4) in Middleton WI, Aric Ingersoll came in early for his shift he doesn't speak to me or say anything positive as a manager and he don't communicate back to me. He came into the kitchen and started to take out the recycling and trash I was cooking and wrapping breakfast food for the end of my shift. Aric just asked out of nowhere, "Are you going to put those up?" At first I didn't respond and I looked around to see what he was referring to and Travis Flannery didn't hear and he was finishing bakery to be put out so I answered Aric saying, "Those are drying we have 45mins left before we are done so I will get them" as I wrapped burgers. Aric starting yelling "I'm not talking to you, when do I ever talk to you" I don't even talk to you" as he is yelling I say "well you did not say anyone's" ->

name so I answered your question." he continued yelling "I don't ever talk to you". SO I started yelling "Stop yelling at me", don't talk to me like that," you introvert". Michael Nataf told me that was the reason Aric Nataf Ingersou didn't talk to me so I used it thinking he would stop yelling. So he didn't and I just to go home. This all happened in the kitchen of Kwiktrip. I felt so violated as a human, I felt scared and belittled. Everyone around the job knew about it but he was not punished. I am the only Black African American female/person in the store. I am the only person that Aric the manager does not communicate with and I don't understand why he treats me that way.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

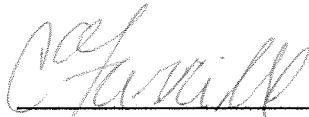
What the court to do if I win my case is to fire Aric Ingersoll, Michelle Natrop, Robert Oldenburg, Susan Schneiderwand, Travis Flannery all to be fired from Kwiktrip Inc due to the policy of Kwiktrip Inc not tolerating racial discrimination / harassment. I also want 200,000.00 after my lawyer fees are paid for humiliation, discrimination, pain and suffering. I had to come to work and feel like I'm nothing because of how I'm treated because I'm black.

E. JURY DEMAND

Jury Demand - I want a jury to hear my case
OR
 Court Trial – I want a judge to hear my case

Dated this 29 day of December 2020.

Respectfully Submitted,



Signature of Plaintiff

608-234-7132

Plaintiff's Telephone Number

Charmaine.Farriell@yahoo.com

Plaintiff's Email Address

6345 Pheasant Lane 57C

Middleton, WI 53562

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE
FILING FEE**

I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.